

Exhibit E  
(Dkt. No. 42-5)  
REDACTED

FEDERAL TRADE COMMISSION

2

7

8 Friday, December 2, 2022

9

10 Via Zoom

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13 The above-entitled matter came on for  
14 investigational hearing, pursuant to notice, at  
15 12:30 p.m., Eastern Standard Time.

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Kieran  
Twitter, Inc. 12/2/2022

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1 agreement at Twitter will prevent you from providing  
2 complete and accurate answers to my questions today?

3 A. No. My recollection is that the agreement is  
4 quite clear that, you know, you have to comply with  
5 legal requirements, so such as a deposition. So I don't  
6 believe that there would be anything that would prevent  
7 me.

8 Q. And you are here today pursuant to a Rule 45  
9 subpoena, correct?

10 A. Which is sitting next to me on my table.

11 Q. Yes. Okay. Are you currently under the  
12 influence of any medications that would affect your  
13 ability to participate in today's deposition?

14 A. No, I am not.

15 Q. Is there any reason you would not be able to  
16 testify accurately and truthfully today?

17 A. No.

18 Q. When did you start working at Twitter?

19 A. I'm going to get the date wrong, but it was the  
20 start of January 2016.

21 Q. And when you joined, what was your job position  
22 there?

23 A. I was hired to lead all non-U.S. litigation and  
24 regulatory matters for the company.

25 Q. Do you remember what your job title was when you

15

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1 first joined?

2 A. I was just a -- so the company was much, much  
3 smaller, so it was just international litigation and  
4 regulatory counsel, but the titles and things changed in  
5 time as the company got larger and the team got larger.

6 Q. And at some point did you change job positions?

7 A. I did.

8 Q. Do you remember roughly when?

9 A. It was the start of 2018, January or February of  
10 2018. Again, I can't remember exact date.

11 Q. Sure. And how did your job position change  
12 around that time?

13 A. Around that time, I was -- basically I was the  
14 successful candidate to become Twitter's first data  
15 protection officer, and so I became the data protection  
16 officer and was charged with sort of starting that team.

17 Q. What does it mean to be a data protection officer  
18 for Twitter or what did it mean to be a data protection  
19 officer for Twitter?

20 A. I mean, you know, obviously it sort of changes  
21 over time as the company changes and scales, but in its  
22 simplest format, what the company was seeking to achieve  
23 was to comply with the requirements of GDPR, which were  
24 coming up to go into effect in May of 2018, and one of  
25 those requirements was to have a data protection officer

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1       that could meet the requirements of the GDPR, and so at  
2       its simplest, it was a data protection officer who would  
3       discharge the obligations under GDPR.

4           Q. And the GDPR are EU regulations, correct?

5           A. Correct. Yes. Yes.

6           Q. Did you also have an additional title -- let me  
7       ask you this, when you were -- when you first became the  
8       first data protection officer for Twitter around early  
9       2018, did you also have additional titles in connection  
10      with other roles that you had at the company?

11          A. I didn't have additional titles. I mean, there  
12       are internal titles that relate to job levels on  
13       ladders, if that's what you mean. And I actually don't  
14       remember what I was at that point in time. I think it  
15       could have been associate legal director, maybe, but I  
16       have to check. But again, those are more a correlation  
17       of seniority as opposed to anything else.

18          Q. So when you became data protection officer in  
19       early 2018, were you still in the legal department at  
20       Twitter?

21          A. I was. I was in the legal department.

22          Q. And at some point did your job position at  
23       Twitter change?

24          A. I don't know that I would view it as ever  
25       changing. It sort of -- the role and the obligations

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1       that I discharged from sort of spring of 2018 to the --  
2       to when I left were effectively the same. They just  
3       changed in the sense that the company's needs shifted  
4       and moved somewhat, but like my core obligations, which  
5       were I think summarized best as when I testified not too  
6       long after I became the data protection officer in 2018,  
7       I testified at the Senate and sort of the statement that  
8       we gave publicly was that my responsibility and my  
9       team's responsibilities were to ensure Twitter's  
10      compliance with global privacy and data protection  
11      requirements. You know, GDPR or otherwise. And so that  
12      never really changed, if that makes sense, it was just  
13      discharging that suite of responsibilities.

14           Q. I understand. So if I had looked at your  
15      LinkedIn profile, for example, and it looked like at one  
16      point it said you were associate legal director and then  
17      at some point, say in February of 2019, it said legal  
18      director and associate general counsel. Is that simply  
19      a reflection of your rising seniority levels and not  
20      necessarily a change in the substance of what you were  
21      doing?

22           A. Yeah, apologies for speaking over you, and  
23      apologies to the court reporter, too.

24           Yes, in short answer, those titles relate to an  
25      internal job ladder which then relates to compensation,

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1 candidly. So, you know, is there value in titles, sure,  
2 the reality, I think, and in-house practice is it's  
3 the -- it's part of your compensation.

4 Q. Now, at some point, Mr. Kieran, you became the  
5 chief privacy officer. Is that correct?

6 A. That's correct.

7 Q. And when did that happen?

8 A. Oh, August of -- and I will get the year wrong  
9 because of Covid, I'm going to say it was 2020, but I  
10 could be wrong. I think it was August 2020.

11 Q. So around August of 2020, thereabouts, you took  
12 on the title of chief privacy officer?

13 A. Correct.

14 Q. Did that come with any change in the -- your job  
15 duties and responsibilities?

16 A. No.

17 Q. Why did the title -- if you can say, why the  
18 title change?

19 MR. KOFFMANN: Could I interpose here just to  
20 caution the witness that, you know, as we discussed,  
21 communications in your role as a lawyer, communications  
22 with company management, company employees, may be  
23 privileged, and so I just caution you, as well as your  
24 impressions about the answer to this question, your  
25 impressions as a lawyer. So I just caution the witness

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1 to -- if he can answer it without going into those  
2 communications or those impressions, that's fine, but to  
3 the extent that the answer does require disclosing  
4 those, I would instruct him not to answer.

5 THE WITNESS: Got it. And, Dan, help me to get  
6 it, I'm trying to keep to the right line of this, so I'm  
7 not sure how best to proceed, if this requires an  
8 offline conversation, but to me this is about career  
9 development stuff, not lawyer stuff.

10 MR. KOFFMANN: I understand.

11 THE WITNESS: So, but if you all want to chat  
12 about it before I talk to Ms. Kim, I'm happy to do that.  
13 That's not my goal at all.

14 BY MS. KIM:

15 Q. Well, let me ask it this way: Mr. Kieran, when  
16 you took on the chief privacy officer title in or about  
17 August of 2020, did you continue to serve as the data  
18 protection officer for GDPR purposes?

19 A. I did. Perhaps maybe the best answer I can give  
20 here without going into the detail of it is at the end  
21 of the day there was a public connotation with a CPO  
22 title in the United States versus a DPO title, and this  
23 is an industry tension, right, whether they mean the  
24 same thing or don't mean the same thing. And so for my  
25 career, it was important to me that I got to that title.

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1     So this has nothing to do with like a legal change or a  
2     thing, it was for my career development. The role did  
3     not change in terms of what I did and how I had to  
4     discharge it.

5                I hope that's okay, Dan.

6                MR. KOFFMANN: Yep, no objection.

7                BY MS. KIM:

8                Q. So starting, let's say, in January of 2020, to  
9     whom were you reporting?

10          A. January of 2020. January of 2020. So the reason  
11     I'm hesitating is at that time -- I can't remember when  
12     there was a change made, but there was a gentleman who  
13     had been hired who did not work out, his name was Todd  
14     Cohen, and he left the company some time around that  
15     period, but I had been reporting to Todd, who reported  
16     to Sean Edgett, the general counsel. After Todd left, I  
17     reported to a person called Stephanie King, and so just  
18     the dates elude me, so I'm not sure when that change  
19     was, if that makes sense.

20          Q. Understood. But it sounds like, in any event, in  
21     terms of the reporting relationships, there would be  
22     someone between you and Sean Edgett, the general  
23     counsel?

24          A. So that changed over the years. So there was a  
25     period further back in time where I reported directly to

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1 because I'm remembering sequencing. So it was five, it  
2 wasn't three. And then voluntary resignations at that  
3 time, while I was there, no.

4 Q. Did you hear of any additional resignations that  
5 happened on the privacy and data protection team after  
6 you left the company?

7 A. So I don't know whether I would call them  
8 resignations. I just want to make sure that the  
9 nomenclature is correct. What I mean is simply that  
10 obviously Mr. Musk provided an opportunity to opt in or  
11 opt out, as it were, and stay with the company or leave.  
12 A number of folks on my team opted to leave -- a lot of  
13 the folks on my old team opted to leave.

14 Q. About how many, if you know?

15 A. About 50 percent.

16 Q. Was that like 15, 16 people?

17 A. Yeah, 15, 16 people.

18 Q. And your understanding was that was in response  
19 to Mr. Musk's instruction about having to -- I forget  
20 the exact wording you used, up their game?

21 A. I don't know the exact wording. I obviously  
22 wasn't there and, you know, I know what was reported in  
23 the media in terms of what was reported, but all I can  
24 speak to is simply the folks on my team who stayed in  
25 touch who I know opted to not remain at Twitter.

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1           A. The information security team.

2           Q. And then at some point did Dr. Kissner formally  
3 become the new CISO?

4           A. Yes. The date of that is going to escape me, but  
5 it was some time in the spring. I can't remember when  
6 we finalized it.

7           Q. I think you mentioned that there were -- when I  
8 asked -- this all came up in response to my question I  
9 asked about whether there were other teams or  
10 departments that you indirectly oversaw or helped manage  
11 and you were talking about the info sec team or  
12 organization, and it sounds like it's in connection with  
13 the various transitions in leadership in that  
14 organization. Is that accurate?

15          A. Yes, with an addition. It wasn't just during the  
16 transitions, whenever you have leaders who are there for  
17 a short period of times, and I don't think this is  
18 unique to the information security team, there will tend  
19 to be individuals who have long-tailed historical  
20 knowledge about how the organization operates and how  
21 things need to be done and support those new individuals  
22 when they're in their roles.

23           And so I served in that capacity for every one of  
24 the people, because I was effectively the longest  
25 standing person with seniority who had knowledge of, you

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1 know, how you do things, what you do, when you do them,  
2 et cetera.

3 Q. Was there someone -- if you had to identify  
4 someone who would have the next most senior  
5 long-standing knowledge that you have that would be  
6 relevant to the info sec team, who would that be?

7 A. So it would have been Joseph Camilleri until he  
8 left to go to Stripe. Then beyond that, it's going to  
9 be folks who have knowledge of pieces, but not the  
10 overall, and that's I think the difference, right? So,  
11 for example, Seth Wilson would have a lot of knowledge  
12 about a portion of the information security program and  
13 what it does. Andy Saylor, a portion of the program and  
14 what it does. But the overarching, like all the things,  
15 there was -- today there is nobody left and there -- you  
16 know, even during the last year, there was nobody other  
17 than myself who had that knowledge.

18 Q. I understand Seth led or leads the DART,  
19 detection and response team.

20 A. That's what it was called. I don't know what  
21 it's called today, but that is what it was called.

22 Q. Is it your understanding that he is no longer at  
23 Twitter?

24 A. No, it's my understanding that he is there  
25 through the end of the year.

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1 variety of other players around the company in different  
2 teams who also have roles that support that program.

3 Q. Does the program have a name? Did the program  
4 have a name?

## 5 A. Privacy and data protection program.

6 Q. And what other teams besides your former privacy  
7 and data protection team supported the privacy and data  
8 protection program?

9 A.

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1 [REDACTED]

3 Q. Without disclosing privileged information, what  
4 can you tell me about the impact of the staff  
5 terminations on the various teams that supported  
6 Twitter's privacy and data protection program?

7 MR. KOFFMANN: Yeah, if I can just --

8 MS. KIM: Just numbers or percentage, roughly.

9 MR. KOFFMANN: Thank you for that clarification.

10 THE WITNESS: So roughly percentage of people  
11 impacted on those various teams, yeah, that's going to  
12 be a little bit hard. I think it's easier for some  
13 things. So, for example, the internal audit team,  
14 because we were no longer going to be a publicly traded  
15 company, internal audit is typically a function for a  
16 publicly traded company. So much of internal audit was  
17 reduced; however, the pieces needed that support a PDP  
18 program were retained and they were actually moved into  
19 my team before I had left. So that's an example.

20 On the security, the information security team,  
21 so I am reluctant to use percentages or hard numbers  
22 here because, candidly, [REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

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1     feasible for a very small number of controls for them to  
2     be owned by sort of an amorphic organization, because  
3     some of the ISO controls are so generalized that it is  
4     less specific to have an owner, but as a general  
5     proposition, you should have an owner for each control.

6           Q. And is that owner for those controls, are they  
7     the person responsible for making sure the control is  
8     operating as it should be?

9           A. Yes. So there's -- there is a -- there's  
10    documentation from ISO and other organizations -- other  
11    standard-setting organizations that talk about what a  
12    control owner should do, not do, be, not be. And so as  
13    a general proposition, within that sort of generalized  
14    guidance from ISO or BSI would be what is expected of a  
15    control owner, you know, implementation, documentation,  
16    ownership measurement, et cetera.

17           Q. Did you have a sense of whether the staff  
18    reductions at Twitter following Mr. Musk's acquisition  
19    affected the headcount of control owners for controls  
20    that rolled up into the privacy and data protection  
21    program?

22           A. So there was an impact on control ownership as a  
23    result of the reductions in force.

24           Q. Without giving a legal opinion, is there anything  
25    you can tell me factually about what that impact was?

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1 For example, numbers of former control owners who are no  
2 longer at the company.

3 A. I couldn't give you that, because I don't  
4 actually know what that correlated to. The number that  
5 I would have would be [REDACTED]  
[REDACTED]  
[REDACTED]

8 Q. Before you reached your decision to resign from  
9 Twitter, had you discussed your decision with anyone  
10 else from the company before you made it final?

11 A. As I mentioned earlier, I had, yes.

12 Q. Can you identify who at the company you had  
13 discussed your decision with before you made it final,  
14 without disclosing privileged information?

15 A. Identifying just people.

16 Q. Yes.

17 A. So I had discussed it with Lea Kissner, with  
18 Marianne Fogarty, and you're only interested in people  
19 at the company, correct?

20 Q. If there's anyone who used to work for Twitter  
21 that you also discussed it with, I would also want to  
22 know that, but at this point, your wife and your  
23 friends, you don't have to tell me that.

24 A. Yeah, understood. So Lea Kissner, Marianne  
25 Fogarty, Seth Wilson, Andy Saylor, Kathleen Pacini,

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1 Kevin Cope. Julianna Hayes. I think that was it.

2 Q. Are those all -- were those individuals all  
3 current employees at Twitter at the time you had those  
4 discussions?

5 A. At the time I had the discussions with them they  
6 were, yes.

7 Q. Is there anything you can tell me about the  
8 nature of your discussions with those individuals  
9 without disclosing privileged information?

10 A. I don't believe so.

11 Q. I'm sorry, you said no?

12 A. I don't believe so.

13 Q. As I understand it, you, Dr. Kissner and  
14 Ms. Fogarty all resigned around the same time. Is that  
15 accurate?

16 A. Within 24 hours.

17 Q. And at the time, Dr. Kissner was Twitter's chief  
18 information security officer?

19 A. Correct.

20 Q. And Ms. Fogarty was the company's chief  
21 compliance officer?

22 A. Correct.

23 Q. Had you planned to resign together or around the  
24 same time?

25 A. No, insofar -- to clarify just the question, like

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1 we're all going to resign at 12:00 p.m., no, that is not  
2 a thing that was discussed. Were there discussions  
3 related -- were there discussions about we were  
4 resigning now-ish, meaning, you know, in short order,  
5 yes.

6 Q. Is there anything more you can tell me, without  
7 disclosing privileged information, about why the three  
8 of you chose to resign around the same time?

9 A. No. I don't believe so. I think the only  
10 additional thing would be just for the avoidance of  
11 doubt in terms of when I asked earlier were you  
12 interested in people that worked at Twitter or not, what  
13 I was actually referring to was the names of lawyers  
14 that I had spoken to outside of the company, and so I  
15 had conversations with lawyers, you know, outside of the  
16 company.

17 Q. Okay. And I don't want to get into that, but  
18 just in terms of it seems that you, Dr. Kissner and  
19 Ms. Fogarty, the news of your resignations all seemed to  
20 come out at the same time as if all three of you  
21 resigned -- chose to resign together. I'm trying to  
22 understand if you would agree that the three of you had  
23 an understanding that you were going to resign around  
24 the same time.

25 A. As I mentioned earlier, a generalized yes, but to

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1 be clear, it wasn't something in unison at some specific  
2 point in time, right?

3 Q. Is there anything you can tell me that's not  
4 privileged about why the three of you chose to resign  
5 around the same time?

6 A. No, the only thing I can share, again, is that I  
7 had conversations with, you know, counsel, and that was  
8 it.

9 Q. Are you able -- I mean, it wasn't just a  
10 coincidence that the three of you resigned at the same  
11 time. Is that correct?

12 A. I can't speak for them, but I think the -- at the  
13 culmination of conversations that we had had as a group  
14 led to our decisions to depart independently.

15 Q. I apologize if I've already asked this, but is  
16 there anything more that you can say -- that's not  
17 privileged -- that you can say about the discussions the  
18 three of you had as a group before your resignations?

19 A. No. I mean, I'm probably stating the obvious,  
20 but I think, you know, we were all members of the data  
21 governance committee at Twitter, and so, you know, our  
22 conversations would have been as it relates to our  
23 obligations under the data governance committee.

24 Q. Is there anything you can say that's not  
25 privileged about whether -- strike that.

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1 Time.)

2 BY MS. KIM:

3 Q. I have marked a document as Exhibit 2, it's a  
4 blog post from the Twitter blog entitled "Our continued  
5 work to protect your privacy and security," it appears  
6 to be dated Wednesday, November 10th, 2021. Do you see  
7 that, Mr. Kieran?

8 A. As if by chance, yes.

9 Q. And it appears to be offered by you and Rinki  
10 Sethi. Is that true?

11 A. Yes.

12 Q. And this is a blog post that's available to the  
13 general public. Is that your recollection?

14 A. Correct.

15 Q. Who wrote this blog post?

16 A. So the comms team helped, but the draft was  
17 written by me and edited by the comms team and then I  
18 reviewed it and approved it and then Rinki reviewed it  
19 and approved it.

20 Q. So this is the governance committee that you were  
21 referring to earlier before we went on break?

22 A. Yes, there were other things in the post, but  
23 yes, the governance committee is part of what's in this  
24 post.

25 Q. So I think you may have started to answer this as

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1 part of your explanation earlier, but I'm looking at the  
2 blog post, second paragraph, starting around the middle  
3 of that second paragraph, it says, "The post says that  
4 the Data Governance Committee (DGC) will ensure we are  
5 making consistent and balanced decisions around how we  
6 use and protect your data."

7 Now, can you explain how the data governance  
8 committee accomplished that objective?

9 A. So the goal of the committee was obviously to be  
10 an approver, a decision-maker with respect to, again, as  
11 I said earlier, collection, use, maintenance, access,  
12 sharing of data that Twitter had obtained or collected,  
13 and so there's a couple of different ways in which the  
14 committee would discharge that obligation. [REDACTED]

24 Q. So this paragraph goes on to say that "the  
25 committee will oversee all decisions to collect,

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1 Beykpour already left the company?

2 A. So Bruce Falck and Kayvon Beykpour left the  
3 company in spring of 2022, and so they were replaced on  
4 the committee with two other individuals, and those two  
5 individuals were Nick Caldwell and Jay Sullivan.

6 Q. Was Nick head of revenue or head of consumer  
7 product?

8 A. So when Kayvon left, Jay Sullivan assumed his  
9 role as head of consumer product. When Bruce left,  
10 there was no one to assume his role immediately, so Jay  
11 actually was running that in the interim all the way up  
12 until, you know, Elon's takeover, or transition.

13 So to deal with that complexity, we had Nick  
14 Caldwell take an interim role on the data governance  
15 committee, because Nick was head of platform  
16 engineering, so he was not head of revenue product or  
17 consumer product, which were the two stated roles. So  
18 in the interim, we had Jay serve -- Jay and Nick serve  
19 on the committee, with the full intention that when  
20 Bruce Falck's backfill was hired, Nick would leave the  
21 committee and Bruce's backfill would take the position.

22 Q. At the time Maryanne Fogarty left or resigned on  
23 November 9th, was Nick Caldwell still serving on the  
24 data governance committee?

25 A. No. So I won't get the dates quite right here,

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1       but Nick and Jay they vacated their roles somewhere in  
2       or around the time of Elon -- Mr. Musk's takeover. So  
3       the 27th -- between the 27th and the 1st, and I wouldn't  
4       know the exact dates.

5           Q. When you say they vacated their roles, did they  
6       leave their jobs at the company or simply step down from  
7       the data governance committee?

8           A. Yeah, so resignations were tendered -- excuse me,  
9       resignations were tendered from their roles at the  
10      company, but it was sort of -- it is -- I am not able to  
11      opine on whether they were fired or whether they  
12      resigned. Yeah.

13          Q. But that happened it sounds like not long before  
14       you left, so Nick Caldwell and Jay Sullivan, who had  
15       been potentially filling -- well, Jay Sullivan was the  
16       new head of consumer product, Nick Caldwell was filling  
17       in for what would have been the head of revenue on those  
18       two slots in the data governance committee, and they  
19       both left the company at some point shortly after Elon  
20       Musk took over?

21          A. Correct. And at that point, we still had three  
22       people, which because of the rules of the committee,  
23       needing three for a decision, we could still operate.  
24       Hence why I said all the way up until Maryanne Fogarty  
25       departed on the 9th, the committee technically could

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1 BY MS. KIM:

2 Q. I'm going to mark the next exhibit. Exhibit 3 is  
3 a blog post it appears by you dated May 25th, 2022  
4 that's titled, "FTC settlement: Our commitment to  
5 protecting your privacy and security." Do you see it?

6 A. I do see it.

7 Q. And is that a blog post that you wrote,  
8 Mr. Kieran?

9 A. In similar vein to the others, though, it is  
10 written in consultation, obviously, with our comms, with  
11 what was our comms team, but yes.

12 Q. So was it written as -- did you help compose it  
13 as a representative of Twitter rather than in your  
14 personal capacity?

15 A. I'm not sure I follow.

16 Q. Was it your understanding that in helping to  
17 draft the language of this blog post that this -- you  
18 were doing so as a representative of Twitter rather than  
19 just you being here and posting as an individual?

20 A. No, this is for the company. Yeah.

21 Q. Were these statements in the blog post at Exhibit  
22 3 truthful at the time you wrote them?

23 A. Yes.

24 Q. At the beginning of the second paragraph, you  
25 wrote, "Keeping data secure and respecting privacy is

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1

Topic	Percentage (%)
1	95
2	95
3	95
4	95
5	95
6	40
7	95
8	95
9	95
10	95
11	95
12	95
13	95
14	95
15	95

██████████ was that workstream completed at the  
21 time you left?

22 A. Yes. That had been completed in or around June,  
23 when we -- when this blog post was done.

24 Q. I'm not asking for privileged information here,  
25 but as of October 26th, the day before Mr. Musk came in,

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1 who was responsible for making sure that the company  
2 complied with the FTC order?

3 A. So the individuals designated for the various  
4 responsibilities were Dr. Kissner for the security  
5 program, myself for the privacy program, and then  
6 obviously we had the data governance committee, which I  
7 have already explained, so for that portion of it. And  
8 then while we had not reached that milestone, the -- at  
9 the first annual sort of certification date, the plan  
10 was that each member of the C-suite would certify  
11 individually for their organization to ensure that we  
12 aligned incentives with resources for complying with the  
13 program requirements.

14 Q. Who at Twitter -- and I apologize if you feel  
15 you've already answered this in your explanations  
16 previously, but who at Twitter was responsible for  
17 developing the company's privacy and data protection  
18 program?

19 A. That would be me.

20 Q. And did you share these responsibilities with  
21 anybody else?

22 A. For developing the program, no. I mean, I sought  
23 feedback and input from a variety of stakeholders, but  
24 the responsibility to develop it and implement it was  
25 me.

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1                 "QUESTION: Without disclosing privileged  
2 information, what can you tell me about your involvement  
3 with the development of this new version of Twitter  
4 Blue?"

5                 THE WITNESS: So I was involved in that I ensured  
6 that the security and privacy reviews were appropriately  
7 conducted.

8                 BY MS. KIM:

9                 Q. And were those security and privacy reviews  
10 appropriately conducted on the new version of Twitter  
11 Blue before it launched in early November?

12                 A. The version that launched on November 9th, yes.

13                 Q. Did the new version of Twitter Blue that launched  
14 in early November undergo any aspect of the company's  
15 software development lifecycle?

16                 A. So the -- to ensure the speed that the product  
17 and engineering team was trying to work at and to ensure  
18 that we did the security and privacy reviews, we ensured  
19 that there was a different measures in place to ensure  
20 that we conducted those reviews; however, it was not in  
21 accordance with the SDLC as we had it before that date.

22                 Q. In what way was it not in accord with the SDLC as  
23 it existed at that date?

24                 A. I think now we're getting into privileged areas  
25 that I probably can't answer.

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1 DISTRICT OF COLUMBIA, to wit:

2

3 I, Sally Jo Quade, RPR, the officer before whom  
4 the foregoing deposition was taken, do hereby certify  
5 that the within-named witness personally appeared before  
me at the time and place herein set out, and after  
having been duly sworn by me, according to law, was  
examined by counsel.

6 I further certify that the examination was  
7 recorded stenographically by me and this transcript is a  
true record of the proceedings.

8 I further certify that I am not of counsel to any  
9 of the parties, nor an employee of counsel, nor related  
to any of the parties, nor in any way interested in the  
outcome of this action.

10

11 As witness my hand and notarial seal this 5th day  
of December, 2022.

12

13

14



15 Sally Jo Quade, RPR  
Notary Public

16

17

18 MY COMMISSION EXPIRES:

19

7/14/2023

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